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17 *Ultimate Fighting Championship and UFC*

18
19 **UNITED STATES DISTRICT COURT**
20 **DISTRICT OF NEVADA**

21 Cung Le, Nathan Quarry, Jon Fitch, Brandon
22 Vera, Luis Javier Vazquez, and Kyle
23 Kingsbury on behalf of themselves and all
others similarly situated,

24 Plaintiffs,

25 v.

26 Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

27 Defendant.
28

Case No.: 2:15-cv-01045-RFB-BNW

**ZUFFA, LLC'S UNOPPOSED MOTION
TO SEAL ZUFFA'S AUGUST 19, 2019
LETTERS TO THE COURT**

Pursuant to Rules 5.2 and 26(c) of the Federal Rules of Civil Procedure and Local Rule 10-5, Zuffa, LLC (“Zuffa”) hereby moves this Court for leave to file under seal Zuffa’s August 19, 2019 letters to the Court re: August 26, 2019 Hearing in *Le v. Zuffa*, 2:15-cv-01045-RFB-BNW (the “Letters re Witness Health”). Good cause and compelling reasons exist to file the Letters re Witness Health under seal, as they contain sensitive and personal medical information and concerns courtroom accommodations for a witness. Plaintiffs have informed Zuffa they do not oppose this motion. Decl. of Nicholas A. Widnell in Support of Zuffa’s Motion to Seal, ¶ 4.

The presumption of public access to court filings unrelated to dispositive motions may be overcome by a showing of good cause under Rule 26(c). See *Pintos v. Pacific Creditors Ass’n*, 605 F.3d 665, 678 (9th Cir. 2010); *Kamakana v. Honolulu*, 447 F.3d 1172, 1179 (9th Cir. 2006). The Court has “broad latitude” under Rule 26(c) “to prevent disclosure of materials for many types of information” and have “consistently granted protective orders that prevent disclosure of many types of information” including “medical and psychiatric records confidential under state law.” *Phillips v. General Motors Corp.*, 307 F.3d 1206, 1211-12 (9th Cir. 2002) (citations omitted).

There is good cause to seal the Letters re Witness Health, as they contain the highly sensitive medical information of two evidentiary hearing witnesses, and are related to courtroom accommodations and scheduling. Even under the more stringent compelling reasons sealing standard, the Letters re Witness Health are properly sealed because “[t]he need to protect medical privacy typically qualifies as a ‘compelling reason’ for sealing records.” *Trujillo v. Bannister*, 2016 WL 6399034, at *2 (D. Nev. Oct. 27, 2016).

Zuffa respectfully requests that the Letters re Witness Health be filed under seal.

DATED this nineteenth day of August, 2019.

1 Dated: August 19, 2019

Respectfully Submitted,

2 BOIES SCHILLER FLEXNER LLP

3 By: /s/ Nicholas A. Widnell

4 Nicholas A. Widnell

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